# IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF PUERTO RICO

IN RE:

**JUAN CARLOS PRADO NICASIO** 

Debtor

**JUAN CARLOS PRADO NICASIO** 

Plaintiff

Vs.

DIONISIO BENITEZ RODRÍGUEZ ALSO D/B/A FERRETERÍA MONTALVO; FERRETERÍA MONTALVO INC. MARILIN PRADO NICASIO BANCO POPULAR DE PUERTO RICO

Defendants

**CASE NO. 19-06224 MCF** 

CHAPTER 13

ADVERSARY NO. 19-462

#### MOTION TO INFORM COMPLIANCE

## TO THE HONORABLE COURT:

**COMES NOW** Plaintiff, through the undersigned attorney and very respectfully **STATES** and **PRAYS** as follows:

- 1. We inform that we have addressed the matters and provided the documents pending in the discovery as per stated by sister counsel Lissette Morales in her letter of April 2, 2021.
- 2. All the documents have been provided by electronic mail thru nine (9) emails.
- 3. The only documents pending are some bank statements and rent receipts that will be provided on or before the next fifteen (15) days.

**WHEREFORE**, it is respectfully requested to this Honorable Court to take notice of the compliance with this Honorable Court Order.

## RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this June 22, 2021.

#### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY: That on this same date I electronically filed the above document with the Clerk of the Court using the CM/ECF System which sends a notification of such filing to attorney and Lyssette Morales Vidal, Esq.. I further certify that I have served this document by electronic means to the CM/ECF participants and or a true and correct copy by regular mail to the non CM/ECF participants and to all creditors and parties with interest.

## RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this June 22, 2021.

/s/Ada M. Conde ADA M. CONDE, ESQ. USDCPR 206209 Law and Justice for All, Inc. PO Box 13268, San Juan, PR 00908-3268 Tel: 787-721-0401 1611lawandjustice@gmail.com